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June 8, 2018

**Via Electronic Filing**

The Honorable Magistrate Judge Steven Tiscione  
U.S. District Court Eastern District of New York  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Chincha v. Patel*  
**Case No.: 1:17-cv-06127-ILG-ST**

Dear Honorable Judge Tiscione:

This law firm represents Defendant Manojkumar Patel in the above-referenced action.

Pursuant to Rules 1(D) of Your Honor's Individual Motion Practices, this letter respectfully serves as a joint request to further extend the mediation completion date. This is the parties' first request for an extension. The suggested new completion date is August 14, 2018.

This letter also respectfully serves as a joint request for an adjournment of the in-person status conference currently scheduled for June 12, 2018. This is the parties' first request for an adjournment. The parties suggest a date and time set by the Court following the completion of mediation.

The basis of both requests is that counsel for Plaintiff is currently traveling on a honeymoon until the 13<sup>th</sup> of June. In addition, the parties need additional time to exchange financial information and business records that are essential to the facilitation of a meaningful mediation.

Thus, the parties respectfully request that the Court allow the parties to extend the mediation completion date to August 14, 2018, and to reschedule the June 12, 2018 in-person conference to a date and time set by the Court following the completion of mediation.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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